

RECEIVED *dp*  
IN THE UNITED STATES COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS *JUL 27 2011*  
*7-37-11*  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

**GERMAINE J GRANT**

Plaintiff.

-v-

**CLIENT SERVICES INC**

Defendant.

1:11-cv-05070

Judge Robert W. Gettleman  
Magistrate Judge Arlander Keys

**COMPLAINT**

Plaintiff, **GERMAINE J GRANT**, hereby sues Defendant, **CLIENT SERVICES INC.**; and alleges:

**PRELIMINARY STATEMENT**

1. This is an action for damages brought for damages for damages for violations of the Fair Credit Reporting Act (FCRA) 15 U.S.C. §1681 *et seq.*

**JURISDICTION AND VENUE**

2. The jurisdiction of this Court is conferred by 15 U.S.C. §1681p.
3. Venue is proper in this Circuit pursuant to 28 U.S.C. §1331b.
4. This is an action for damages which do not exceed \$5,000.00.
5. Plaintiff, **GERMAINE J GRANT**, is a natural person and is a resident of the State of Illinois.
6. Defendant, **CLIENT SERVICES INC**, is a Missouri Corporation, authorized to do business in Illinois.
7. All conditions precedent to the bringing of this action have been performed, waived or excused.

**FACTUAL ALLEGATIONS**

8. On November 3, 2010, **CLIENT SERVICES INC** initiated a hard pull of Plaintiff's credit report from Experian without permissible purpose, thereby reducing his credit score.

**FILED**  
**8/1/2011**  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

9. Twice on November 3, 2010, and on November 5<sup>th</sup>, 2010 CLIENT SERVICES INC initiated a soft pull of Plaintiff's credit report from ~~Experian~~ without permissible purpose.

**COUNT I**

**VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. §1681  
WILLFUL NON-COMPLIANCE BY DEFENDANT CLIENT SERVICES INC**

10. Paragraphs 1 through 9 are realleged as though fully set forth herein.

11. Plaintiff is a consumer within the meaning of the FCRA, 15 U.S.C. §1681a(c).

12. CLIENT SERVICES INC is a furnisher of information within the meaning of the FCRA, 15 U.S.C. §1681s-2.

13. CLIENT SERVICES INC willfully violated the FCRA. Defendant's violations include, but are not limited to, the following:

(a) CLIENT SERVICES INC willfully violated 15 U.S.C. §1681b(f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by 15 U.S.C. §1681b.

WHEREFORE, Plaintiff demands judgment for damages against CLIENT SERVICES INC for actual or statutory damages, and punitive damages, attorney's fees and costs, pursuant to 15 U.S.C. §1681n.

**COUNT II**

**VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. §1681  
NEGLIGENT NON-COMPLIANCE BY DEFENDANT CLIENT SERVICES INC**

14. Paragraphs 1 through 9 are realleged as though fully set forth herein.

15. Plaintiff is a consumer within the meaning of the FCRA, 15 U.S.C. §1681a(c).

16. CLIENT SERVICES INC is a furnisher of information within the meaning of the FCRA, 15 U.S.C. §1681s-2.

17. CLIENT SERVICES INC negligently violated the FCRA. Defendant's violations include, but are not limited to, the following:

(a) CLIENT SERVICES INC negligently violated 15 U.S.C. §1681b(f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by 15 U.S.C. §1681b.

WHEREFORE, Plaintiff demands judgment for damages against CLIENT SERVICES INC for actual damages, and attorney's fees and costs, pursuant to 15 U.S.C. §1681o.

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial by jury of all issues so triable as a matter of law.

Dated: July 27, 2011

Respectfully submitted,

*Germaine J. Grant*  
GERMAINE J GRANT  
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